Gluten-Free Certification Program (GFCP)
TECHNICAL RELEASE #3
June 3, 2015 - Toronto, ON

This Technical Release Includes:

1. Latest announcement on regulations concerning gluten-free claims on oat containing products in Canada

1. Canada Allows Restricted Declarations on Gluten-Free Products Containing Oats:

On May 29, 2015, Health Canada announced that they had registered a Marketing Authorization (MA) which is effective immediately and permits the use of gluten-free claims for gluten free oats and foods that contain them as ingredients. The MA is a prelude to an official regulatory change which will be forthcoming. All should be aware that unlike the unlimited use of oats in gluten-free products in the USA, some restrictions apply to gluten-free oat products sold in Canada. These are:

   a) The food contains no oats other than specially produced "gluten-free oats" (i.e. agronomic and handling practices in place to ensure that there is not more than 20 ppm of gluten);
   b) The finished product does not contain greater than 20 ppm of gluten from wheat, rye, barley or their hybridized strains;
   c) The food contains no intentionally added gluten from wheat, rye, barley, or their hybridized strains; and
   d) The "gluten-free oats" are clearly identified as such in all cases where 'oats' are referenced, including in the list of ingredients.

This decision was rendered after a lengthy consultation and scientific review. It recognizes several issues:

1. Oats provide a nutritious source of proteins, carbohydrates and especially fibre. Eating foods made with gluten free oats provides a wider choice of grain and cereal-type foods for people with celiac disease. Sticking to a gluten free diet can be a challenge because of limited food choices. Introducing oats to a gluten-free diet could help people better cope with this challenge.

2. Only "gluten-free oats" are allowed which requires the management of potential sources of contamination at production, harvest, storage, transportation and milling either as a food or as an ingredient in a gluten-free food.

3. “Gluten-free oats” must appear as the common name or in the list of ingredients for those persons that may be sensitive to oats or wish to avoid them.


You should be aware that, although the regulations for “gluten-free oats” and gluten-free products containing oats have been liberalized, restrictions for Canada still apply. The USFDA has nearly unrestricted allowance for oats and their focus is on the end product result to be <20 ppm for gluten. However, the GFCP requires a
gluten-free management system whereby, but not limited to, all ingredients and inputs must be gluten-free as well as the gluten-free product.

We are very excited about the prospect of expanding the GFCP to include gluten-free oat products in Canada. The GFCP and its management system approach are complementary to this change in regulation in Canada as it needs to ensure that the necessary level of protection for persons with celiac disease and gluten sensitivity is consistently attained.


Naturally, the new oat policy for Canada has necessitated some changes to the GFCP Standards and Policies Document and GFCP Manual to ensure clarity for all parties which includes existing and future clients as well as auditors and Certification Bodies. This also created the opportunity to update changes from previous Technical Releases such as:

- Accountability of the GFCP resides with the President of the Allergen Control Group
- The addition of the endorsement by the National Foundation For Celiac Awareness and their trademark
- Addition of the GFCP Trademark User Guide and Criteria for GFCP Approved Auditors in Schedules 1 and 2 respectively.
  (Translations into French to follow)

No other changes to the GFCP requirements have occurred. For future reference and especially for facilities which are recognized or new ones about to be audited, please see:

- GFCP Standards and Policies Document (Version June 1, 2015) ACG-GFCP-STD-02
- GFCP Manual (Version June 1, 2015) ACG-GFCP-MAN-02

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